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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD KLEIN, RAYMOND URIAS, and
SARA J. GUNTER, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2005-3; NATIONAL
COLLEGIATE STUDENT LOAN TRUST
2006-3; NATIONAL COLLEGIATE
STUDENT LOAN TRUST 2007-1;
NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2007-2; NATIONAL
COLLEGIATE STUDENT LOAN TRUST
2007-3; NATIONAL COLLEGIATE
STUDENT LOAN TRUST 2007-4;
PENNSYLVANIA HIGH EDUCATION
ASSISTANCE AGENCY d/b/a AMERICAN
EDUCATION SERVICES; and
TRANSWORLD SYSTEMS, INC.,

Defendants.

Case No. 2:22-cv-01392-GMN-BNW

**JOINT STIPULATED MOTION AND
PROPOSED ORDER TO EXTEND
DEADLINE FOR AES TO RESPOND
TO PLAINTIFFS' FIRST AMENDED
COMPLAINT**

(THIRD REQUEST)

STIPULATION

Plaintiffs Richard Klein, Raymond Urias, and Sara J. Gunter ("Plaintiffs"), and Defendant American Education Services, LLC ("AES"), by and through their undersigned counsel, hereby jointly stipulate, agree, and move as follows:

1. On December 23, 2022, Plaintiffs filed their First Amended Complaint

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1 (“Complaint”). ECF No. 20.

2 2. On December 29, 2022, Plaintiff served the Summons and Amended Complaint on
3 AES. ECF No. 24.

4 3. The deadline to respond to the Amended Complaint was originally set for January
5 19, 2023. *Id.*

6 4. On January 24, 2023, AES sought an extension, up to and including February 6,
7 2023, to respond to the Complaint. ECF 28.

8 5. On February 6, 2023, all parties obtained an extension, up to and including March
9 8, 2023, for Defendants to respond to the Complaint. ECF 32.

10 6. Counsel for AES fell ill and did not have an opportunity to seek the instant
11 stipulation before the March 8, 2023 deadline. Once counsel was able, counsel promptly sought the
12 instant stipulation. Thus, excusable neglect exists for filing this stipulation after the March 8, 2023
13 deadline to file a responsive pleading.

14 7. Additional time is needed to finalize a responsive pleading to the Complaint.

15 8. The Parties have agreed that AES shall have up to and including March 15, 2023 to
16 file its responsive pleading to the Amended Complaint.

17 9. This is the third requested extension by AES. Two previous extensions were sought
18 by, and granted to, AES.

19 10. Granting this joint stipulated motion (“Joint Stipulated Motion”) for an extension of
20 time for AES to respond to the Complaint will neither prejudice any party nor unreasonably delay
21 the litigation.

22 **IT IS SO STIPULATED.**

23 **DATED** this 10th day of March, 2023.

DATED this 10th day of March, 2023.

24 /s/ Patrick J. Reilly
25 Patrick J. Reilly, Esq.
26 Monique S. Jammer, Esq.
BROWNSTEIN HYATT FARBER
SCHRECK, LLP

24 /s/ Gerardo Avalos
25 Scott C. Harris, Esq.
26 George Haines, Esq.
Gerardo Avalos, Esq.
FREEDOM LAW FIRM

27 *Attorneys for American Education*
28 *Services, LLC*

Attorneys for Plaintiffs and the Class


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ORDER

Pursuant to the foregoing Joint Stipulated Motion, and with good cause and excusable neglect appearing, **IT IS HEREBY ORDERED** as follows:

AES shall have up to and including March 15, 2023 to file its responsive pleading to the Complaint in this action.

Dated: March 13, 2023



United States Magistrate Judge